

EXHIBIT 3



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March 19, 2019

Daniel V. Dorris, Esq.
Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.
1615 M Street, NW
Suite 400
Washington, DC 20036

Re: In re Dealer Management System Antitrust
Litig., MDL No. 2817, Cox v. CDK (18-CV-
1058)

Dear Counsel:

I write in response to your March 14, 2019 letter and in an effort to assist in making the parties' discussion tomorrow as efficient as possible.

Data Syndication: With regard to the data syndication-related requests (RFP 45, 69-71, and 85-86), we ask that Cox explain what specifically was done to identify responsive documents. We appreciate the reference to the January 16, 2019 production. We would like confirmation that Cox has not withheld non-privileged documents responsive to these requests. In addition, your letter refers to Requests 95-96. We assume this was a typo, and you meant to reference Requests 85-86, but would appreciate confirmation on this point as well.

DMS Access: Cox states that it "would not have intentionally withheld documents" responsive to Requests 48-62, which also fall within certain of Cox's "relevancy categories." That is not the standard for meeting discovery obligations, so we would like to discuss this tomorrow.

Data License Agreement between CDK and Autotrader (the "Data License Agreement"): Thank you for your offer to consider reasonable proposals for discovery on this claim. We propose that Cox produce the following categories of documents by April 5th:

- Communications between CDK and Cox regarding SRP or VDP metrics and relating to negotiating and/or performing under the Data License Agreement;
- Documents relating to Cox's performance under Exhibit B to the Data License Agreement;

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- Documents relating to the negotiation of the Data License Agreement, and Cox's refusal to provide the SRP and/or VDP metrics requested by CDK, including those metrics that were available to clients on the Autotrader website;
- Any documents Cox may rely upon to support its affirmative defenses relating to the Data License Agreement, including any documents Cox claims suggest CDK has not performed under the Data License Agreement;
- Documents sufficient to show any third parties to whom Autotrader licenses SRP and/or VDP metrics, and agreements with those third parties for the same.

Financial Data: In your letter, at n.1, you reference additional Ossining reports that still have not been produced, and you also note that Cox is investigating the existence of additional switching data. In light of the upcoming data deposition scheduled for April 4th, we request that all outstanding financial, pricing, and switching data be produced by this Friday, March 22nd. With regard to the data requested on a dealer-by-dealer basis, please confirm whether Cox possesses responsive documents that have not been produced which are sufficient to show this information, and whether you will agree to voluntarily produce such documents.

In addition, Cox produced 167 native PowerPoint presentation files in its production volume 006, but they do not appear to contain the correct file extensions. We ask that you resend those 167 files with proper extensions (.ppt or .pptx) no later than March 29th.

As you know, continuing deficiencies in Cox's production will materially prejudice CDK's ability to prepare for the upcoming Rule 30(b)(6) depositions of Cox. CDK reserves all rights in this regard.

We look forward to addressing these matter with you tomorrow.

Sincerely,

/s/

Robert E. Entwisle